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To the National Organic Standards Board Concerning Ferric Phosphate:

I am an organic grower of organic strawberries, raspberries and vegetables in Watsonville, CA and have been certified organic for 9 years. I work as a consultant with many other berry companies to improve their organic production and do agricultural research. I also sit as Chair of the Board of California Certified Organic Farmers representing over 1300 certified producers. This statement on Ferric Phosphate is given as a grower, consultant, and the Chair of CCOF.

I do not agree with the 2 TAP reviewers and their reasoning for not allowing ferric phosphate to be used for organic production. I believe these two reviewers have no idea how organic farming occurs and have never ever really seen a commercial organic operation. Their comments were more appropriate to a small garden, not a farm run as a business.

Reasons I believe ferric phosphate should be allowed and the TAP reviewers were wrong:

1. No viable control exists for organic production if snails or slugs exist. Slugs and snails are ever present in our fields because of constant irrigation. There are no ways to exclude the snails and slugs because they are already in the fields when the fields are planted. Heavy infestations occur in the spring when markets are highest and the crops are just establishing. In the spring, we can lose up to 10-20% of the first berries from slug damage.
2. Slugs and snails can crawl out of the produce when it gets to market causing a quarantine issue when the produce is shipped. Organic strawberries need to have the same marketing characteristics as conventional strawberries when they arrive, which means be free of pests. A slug crawling out of a single box can stop an entire pallet (120 boxes) from entering Florida or England causing a huge financial loss to the grower.
3. Copper bands are unusable around a field because they are very expensive if used on a large scale, a field more then 1/4 an acre, and make tractor work or even foot traffic around a field

impossible without damaging the bands.

4. One reviewer said "spraying household ammonia" can be used as a control. This isn't even legal for organic production and a reviewer is using this as a reason to not allow ferric phosphate for organic production? That is ridiculous. The National Organic Standards Board should not be paying for technical reviews that are this unprofessional.
5. Beer Traps in my fields? It is not legal for me as an employer to have beer in my fields around employees (can you imagine my Workman's Compensation Company finding out about that) and I would be responsible if some teenager came to my farm, drank the beer, then left and got into a car accident. To even suggest these as a control for slugs and snails is again ridiculous. Once again, I question why the NOSB is paying for this type of review that is very unprofessional.
6. One year we did really try to trap the slugs out. We put out 100s of wood boards, wet them down every night, then scrapped off the slugs in the morning and killed them. We did this in a ½ acre block. It took an employee 3 hours a day. It cost us a little over \$500 in labor, cost prohibitive for that ½ acre block and we eventually just gave up. It also created a huge problem trying to do tractor work because the boards would have to be completely removed from the field before the tractors could go in. We were still discing up wood boards 2 years later that we had forgotten to pick up.
7. With the commodities I grow, berries or vegetables, no other trap crop would be viable that a slug would prefer over the berries.
8. All the reviewers agreed that Ferric Phosphate is safe for the environment and occurs naturally, just not in sufficient quantities to help in slug control.

I hope the NOSB understands my reasoning why Ferric Phosphate is needed for slug and snail control in organic production and will consider adding it to the National List of allowed materials. I also hope the NOSB works out its issues and can get products reviewed in a more timely fashion. Ferric Phosphate has waited 2 years for its review, then we as growers had only 2 weeks to respond before the NOSB meeting where the decision is made on the material. I feel this wait of 2 years was too long. TAP reviewers also need to be professionals in organic agriculture and not just throwing out alternatives they may have read in a gardening magazine.

I want to thank the NOSB for their time.

Vanessa Bogenholm
Owner VB Farms
Chair of the Board, California Certified Organic Farmers